

James R. Hawkins (SBN 192925)
Isandra Fernandez (SBN 220482)
Anthony L. Draper (SBN 344391)
james@jameshawkinsaplc.com
isandra@jameshawkinsaplc.com
anthony@jameshawkinsaplc.com
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676

Attorneys for Plaintiff, TIFFANY
SOLIMAN, on behalf of herself and others
similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

TIFFANY SOLIMAN, MARIA
CARRALEZ, and EUGENE BAUTISTA
on behalf of themselves and all others
similarly situated

Plaintiff,

vs.

SATELLITE HEALTHCARE, INC., a
California corporation, and DOES 1 through
50, inclusive,

Defendants.

Case No. 21CV387218
ASSIGNED FOR ALL PURPOSES TO:
JUDGE: Hon. Theodore Zayner
DEPT: 19

**DECLARATION OF TIFFANY SOLIMAN
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

I, Tiffany Soliman, declare as follows:

1. I am a Named Plaintiff and PAGA Representative in the case of *Soliman v. Satellite Healthcare, Inc.* Santa Clara Case No. 21CV387218. I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so.

2. I was employed by Satellite Healthcare, Inc. (“Satellite”) from on or about April 2017 through on or about October 7, 2020 and occupied a non-exempt position as Dialysis Tech.

3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I had against Satellite, I was made aware of the advantages and disadvantages of litigation. I was also made aware of my responsibilities as both a Plaintiff and a class representative prior to filing the class action complaint which was filed on September 29, 2021. I accepted the responsibility and agreed to move forward. I also accepted the responsibilities as a named plaintiff and representative under the Private Attorneys General Act (“PAGA”). I pledged to participate actively in the lawsuits.

4. During the litigation of this action, I continuously interacted with my attorneys to discuss the status of the case and I provided oral and documentary information necessary to prosecute this case. I provided information to my attorneys which helped in the informal document production from Satellite. Also, I took time from work and was available to my counsel during the mediation and provided information which ultimately assisted in the settlement of this class and PAGA action.

5. By agreeing to bring this action, I formally accepted the responsibilities of representing the interests of Aggrieved Employees in California and willingly chose to assume risks and potential costs that I alone might have to bear if judgement would have been rendered in favor of Satellite.

6. As part of the PAGA settlement, I also signed a general release releasing all claims I have or may have against Satellite which is far broader than the release by other Aggrieved Employees who are only releasing PAGA civil penalty claims. The incentive payout also serves as compensation for agreeing to a full, general release of all claims against Satellite.

7. I also risked the potential stigma of being the named plaintiff in a representative

1 action labor dispute which could affect my further employability in the industry or with any
2 prospective employer who learns of my lawsuit against a former employer. I have not found work
3 as a dialysis technician since bringing this lawsuit.

4 8. The incentive payout, subject to court approval, is Ten Thousand Dollars
5 (\$10,000). I believe that this amount is fair and reasonable in light of the efforts and risks of
6 litigating this action as a class and PAGA representative which has resulted in a favorable
7 outcome to the Aggrieved Employees and class members. This incentive payment is also in
8 consideration for executing a general release of all my claims against Satellite.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Executed on this 10th day of December, 2024 at Alameda, California.

13 DocuSigned by:

14 
52F83740AD7B4DD...

15 Tiffany Soliman
16 Plaintiff